

***Remarks***

Reconsideration of this Application is respectfully requested.

Upon entry of the foregoing amendment, claims 1-20 are pending in the application, with claims 1, 11, and 17 being the independent claims. Claims 2-10, 12-16, and 18-20 are amended to correct punctuation. These changes are believed to introduce no new matter, and their entry is respectfully requested. Based on the above amendment and the following remarks, Applicants respectfully request that the Examiner reconsider all outstanding objections and rejections and that they be withdrawn.

***Rejections under 35 U.S.C. § 103***

***Chen in view of Feuer***

Claims 1-20 stand rejected under 35 U.S.C. § 103(a), as being allegedly unpatentable over U.S. Patent Application Publication No. 2001/0030950 to Chen et al. (herein "Chen") in view of United States Patent No. 7,068,668 to Feuer (herein "Feuer"). Applicants respectfully traverse the rejection and provide the following arguments to support patentability as follows:

As stated in the Office Action dated October 15, 2007 (herein "Office Action"), Chen does not teach or suggest at least the feature of "the gateway receives a packet payload from the IP network and determines if the received packet payload is a voice packet or a data packet, if the received packet payload is a voice packet, the gateway further determines if the voice packet is destined for the analog telephone or a media terminal adapter, if the voice packet is destined for the analog telephone, the gateway depacketizes the voice packet, generates an analog voice signal, and transmits the analog

voice signal via the second telephone line to the analog telephone, if the voice packet is destined for the media terminal adapter, the gateway reformats the voice packet and transmits the reformatted voice packet via the first telephone line" as recited by claim 1. (*see*, Office Action, Page 2 through Page 3). For the reasons to be discussed below, Feuer does not provide the missing teaching or suggestion with respect to claim 1. Thus, the combination of Chen and Feuer does not render obvious claim 1.

The Office Action alleges a gateway 51 of Feuer teaches or suggests a gateway to "[to depacket] the voice packet, [to generate] an analog voice signal, and [to transmit] the analog voice signal via the second telephone line to the analog telephone" "if the voice packet is destined for the analog telephone" and/or a gateway "[to reformat] the voice packet and [to transmit] the reformatted voice packet via the first telephone line" "if the voice packet is destined for the media terminal adapter" as recited by claim 1. (*see*, Office Action, Page 3).

As shown in FIG. 1 of Feuer, the gateway 51 provides an interface between an Internet Protocol (IP) network 13 and a phone 53. According to Feuer,

[a] unified message system is set up to take voice messages and facsimile messages from [a] switch 101 and convert them to e-mail messages which can then be transmitted ... to the IP network 13. In addition, the unified message system can take e-mail messages from the IP network 13 and convert them to voice messages that are then sent through switch 101 to ... [the] phone 53 connected to the IP network by a gateway 51.

(*see*, Feuer, col. 6, lines 36-46).

In other words, Feuer merely teaches or suggests the phone 53 may receive voice messages, converted from e-mail messages, from the IP network 13 via the gateway 51. Clearly, this does not teach or suggest a gateway "[to depacket] the voice packet, [to generate] an analog voice signal, and [to transmit] the analog voice signal via the second

telephone line to the analog telephone" "if the voice packet is destined for the analog telephone" and/or a gateway "[to reformat] the voice packet and [to transmit] the reformatted voice packet via the first telephone line" "if the voice packet is destined for the media terminal adapter" as recited by claim 1. In fact, Feuer does not mention whether the phone 53 represents an analog phone, and therefore does not teach or suggest the specific functional features that are recited by Applicant's claim 1 for analog phones.

Thus, the combination of Chen and Feuer does not teach each and every claim limitation of independent claim 1. Therefore, the applied references cannot be used to be establish a *prima facie* case of obviousness for these claims. (See, MPEP §2143.A) Thus, the combination of Chen and Feuer does not render obvious claim 1. Dependent claims 2-10 are likewise not rendered obvious by the combination of Chen and Feuer for the same reasons as claim 1 from which they respectively depend and further in view of their own respective features. Accordingly, Applicants respectfully request that the rejection of claims 1-10 under 35 U.S.C. § 103(a) be reconsidered and withdrawn.

The combination of Chen and Feuer does not teach or suggest each and every feature of claim 11. For example, as discussed above in regards to claim 1, the combination of Chen and Feuer does not teach or suggest at least the features of "determining by the gateway if the received packet payload is voice packet or data packet, "if the received packet payload is a voice packet, further determining by the gateway if the voice packet is destined for a telephone coupled to a first telephone line or a second network coupled to a second telephone line and having a plurality of media adapter terminals," "depacketizing the voice packet, generating an analog voice signal,

and transmitting the analog voice signal over the first phone line by the gateway to the telephone if the voice packet is destined for the telephone," and/or "reformatting the voice packet and transmitting the reformatted voice packet over the second phone line to the second network by the gateway, if the voice packet is destined for the second network" as recited by claim 11. Dependent claims 12-16 are likewise not rendered obvious by the combination of Chen and Feuer for the same reasons as claim 11 from which they respectively depend and further in view of their own respective features. Accordingly, Applicants respectfully request that the rejection of claims 11-16 under 35 U.S.C. § 103(a) be reconsidered and withdrawn.

The combination of Chen and Feuer does not teach or suggest each and every feature of claim 17. For example, as discussed above in regards to claim 1, the combination of Chen and Feuer does not teach or suggest at least the features of "means for determining if the received packet payload is voice packet or data packet," "if the received packet payload is a voice packet, means for determining if the voice packet is destined for a telephone coupled to a first telephone line or a second network coupled to a second telephone line and having a plurality of media adapter terminals," "means for depacketizing the voice packet, means for generating an analog voice signal, and means for transmitting the analog voice signal over the first phone line to the telephone if the voice packet is destined for the telephone," and/or "means for reformatting the voice packet and transmitting the reformatted voice packet over the second phone line to the second network, if the voice packet is destined for the second network" as recited by claim 17. Dependent claims 18-20 are likewise not rendered obvious by the combination of Chen and Feuer for the same reasons as claim 17 from which they respectively depend

and further in view of their own respective features. Accordingly, Applicants respectfully request that the rejection of claims 17-20 under 35 U.S.C. § 103(a) be reconsidered and withdrawn.

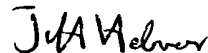
***Conclusion***

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.



Jeffrey T. Helvey  
Attorney for Applicants  
Registration No. 44,757

Date: 11/15/08

1100 New York Avenue, N.W.  
Washington, D.C. 20005-3934  
(202) 371-2600

738608\_1.DOC